

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: MICHAEL HENNING,	:	CASE NO. 20-bk-02618-MJC
	:	
Debtor.	:	CHAPTER 13
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LAKEVIEW LOAN SERVICING, LLC,	:	
	:	
Movant,	:	
	:	
v.	:	11 U.S.C. §362
	:	
MICHAEL HENNING,	:	
	:	
Debtor/Respondent	:	
	:	
JACK N ZAHAROPOULOUS, Trustee	:	
	:	
Additional Respondent.	:	

DEBTOR'S OBJECTION TO CERTIFICATION OF DEFAULT

AND NOW, comes the Debtor, Michael Henning, by and through his Attorney, Patrick J. Best, of ARM Lawyers, who hereby objects to Movant's Certification of Default for the reasons that follow.

1. Movant alleges that Debtor has defaulted on the Stipulation and Order dated October 1, 2021.
2. Debtor denies this default.
3. More specifically, Debtor maintains that he has made all applicable mortgage payments and is unsure as to why Movant believes they were not paid.
4. However, out of an abundance of caution, Debtor has also filed a Motion to Modify Plan which proposes to repay the alleged arrears.
5. Thus, Movant should not be entitled to relief as Debtor either paid the alleged arrears or Movant will be paid through the Plan.
6. Debtor's residence is necessary for an effective reorganization and equities favor denying Movant's request for Certification of Default in this matter.

WHEREFORE, Debtor respectfully requests that this Honorable Court deny Movant's request for Certification of Default.

Date: January 19, 2023

/s/ Patrick J. Best
Patrick J. Best, Esq.
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